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Attorneys for Defendant  
JUNIPER NETWORKS, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IMPLICIT NETWORKS, INC.,  
  
Plaintiff,  
  
vs.  
  
JUNIPER NETWORKS, INC.,  
  
Defendant.

Case No. 3:10-cv-4234-SI

**AGREED STIPULATION REGARDING  
PATENT LOCAL RULE 2-2 INTERIM  
MODEL PROTECTIVE ORDER**

Action filed: September 20, 2010

1 WHEREAS Patent Local Rule 2-2 provides that the Northern District Interim Model  
 2 Protective Order (“Model Protective Order”) governs this case and will continue to govern unless  
 3 the parties agree otherwise;

4 WHEREAS, paragraph 8 of the Model Protective Order imposes a prosecution bar  
 5 applicable to “the subject matter of the invention and of highly confidential technical information  
 6 to be produced”;

7 WHEREAS, for the avoidance of doubt, the parties wish to memorialize their agreement  
 8 regarding the subject matter of the prosecution bar in this case;

9 THEREFORE, the parties hereby stipulate that “the subject matter of the invention and of  
 10 highly confidential technical information to be produced,” for purposes of the Model Protective  
 11 Order in this case (including paragraph 8) is “data demultiplexing, or network routers, switches,  
 12 and security products, including the operating system and software used to control network  
 13 routers, switches, or security products.” Moreover, the parties are agreed and hereby stipulate that  
 14 this definition of the subject matter of the prosecution bar shall apply in this case retroactively and  
 15 going forward as if inserted in full as appropriate into paragraph 8 of the Model Protective Order,  
 16 and shall be enforceable as if fully set forth therein.

17  
 18 DATED: September 13, 2011

HOSIE RICE LLP

19  
 20 By: /s/ George F. Bishop  
 George F. Bishop

21 Attorneys for Plaintiff Implicit Networks, Inc.

22 IRELL & MANELLA LLP

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 24 By: /s/ Nima Hefazi  
 Nima Hefazi

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 26 Attorney for Defendant Juniper Networks,  
 Inc.

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2  
3 DATED: 9/15, 2011



Hon. Susan Illston  
United States District Court Judge